

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CRYSTALLEX INTERNATIONAL CORP.,)	
)	
<i>Plaintiff,</i>)	
)	No. 1:17-mc-00151-LPS
v.)	
)	
BOLIVARIAN REPUBLIC OF VENEZUELA,)	
)	
<i>Defendant.</i>)	
)	
_____)	

THE VENEZUELA PARTIES' RESPONSE TO ORDER REGARDING REDACTIONS

In conformity with this Court's April 1, 2025 Order, D.I. 1648, the Bolivarian Republic of Venezuela (the "Republic"), Petróleos de Venezuela, S.A. ("PDVSA"), PDV Holding, Inc. ("PDVH"), and CITGO Petroleum Corporation ("CITGO") (together with the Republic, PDVSA, and PDVH, the "Venezuela Parties") respectfully submit this response regarding their proposed redactions to portions of the Venezuela Parties' Objection to the Special Master's Recommendation of Stalking Horse ("Objection"), D.I. 1639, and Motion for a Short Stay of the Sale Process ("Motion to Stay"), D.I. 1642.

As explained in the Venezuela Parties' letter in support of their proposed redactions, D.I. 1646, the Venezuela Parties sealed narrow portions of both the Objection and the Motion to Stay pursuant to this Court's Confidentiality Order, D.I. 291, because they referred to information that was disclosed to the Sale Process Parties by the Special Master about his negotiations with bidders during the stalking horse round. D.I. 1646 at 1–2. The Special Master has repeatedly told the Venezuela Parties that he considers such information confidential under the Confidentiality Order and has instructed the Venezuela Parties not to disclose it in public filings. *See e.g.*, D.I. 1376 at 2

(CITGO, PDVH, and PDVSA's motion for leave to file confidential information under seal based on the Special Master's instruction to do so); D.I. 291 ¶ 1; *id.* ¶¶ 4, 8 (prohibiting parties from disclosing, summarizing, describing, or characterizing "non-public, confidential, proprietary, or commercially sensitive information" to anyone other than the Court, the Sale Process Parties, or "other persons whom the Special Master agrees may possess Confidential Information").

The Venezuela Parties take no position on whether the information should remain under seal. Counsel for the Venezuela Parties contacted the Special Master's counsel and Gold Reserve, Inc.'s counsel for their positions regarding keeping this information redacted. Gold Reserve has no objection to unsealing this information, and the Special Master does not request that the information remain under seal or take a position on whether it should remain under seal.

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